

**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF NEW YORK**

1 ST AMENDMENT PRAETORIAN,)	
)	
)	
Plaintiff,)	
)	Civil Action No. 1:23-cv-00012
v.)	
)	
THE NEW YORK TIMES COMPANY)	The Hon. Mary Kay Vyskocil
)	
-and-)	ORAL ARGUMENT REQUESTED
)	
ALAN FEUER,)	
)	
Defendants.)	
)	

NOTICE OF MOTION

PLEASE TAKE NOTICE that, upon the annexed Memorandum of Law, Declaration of Demetri Blaisdell dated March 14, 2024, and Exhibits 1-12 annexed thereto, Defendants The New York Times Company and Alan Feuer, by and through their undersigned counsel, will move this Court before the Honorable Mary Kay Vyskocil at the United States Courthouse for the Southern District of New York, 500 Pearl Street, New York, New York, for an order dismissing Plaintiff's First Amended Complaint with prejudice pursuant to Federal Rule of Civil Procedure 12(b)(6).

Pursuant to the Court's January 16, 2024 scheduling order and Local Rule 6.1(b), Plaintiff's opposition must be filed by March 28, 2024, and any reply by Defendants must be served by April 4, 2024.

Dated: New York, New York
March 14, 2024

Respectfully submitted,

THE NEW YORK TIMES COMPANY

/s/ Demetri Blaisdell

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